

## **Chapter 6**

# **Establishing and Assessing a Unit Program**

“The unit does well what the commander checks.”

General Bruce C. Clarke

Chapter 5 introduced the installation/garrison/base organizations, responsibilities and support to units stationed at, or performing training on an installation/base. Chapter 6 illustrates how that structure supports leaders in establishing and assessing a unit program. Unit-level environmental programs require guidance and support from the chain of command. Army major Army commands (MACOMs) and Marine Corps higher HQs conduct environmental assistance visits to ensure that installations comply with appropriate environmental laws. Unit leaders coordinate with the installation's environmental office and their higher HQ for assistance visits and compliance audits within the unit area. Additionally, unit leaders or their designated representatives, conduct self-assessments to determine how well their unit is following environmental protection measures at the unit level. Unit leaders incorporate certain environmental protection measures into the unit's SOP to ensure their soldiers and Marines use appropriate environmental protection measures.

## **ENVIRONMENTAL COMPLIANCE**

6-1. The Army and Marine Corps determine environmental compliance status in two ways. Federal, state, and local regulatory agencies conduct formal compliance audits and spot checks on installations and report their findings to the military chain of command. Additionally, each service provides installation inspections under the Army's ECAS or Marine Corp's ECE. Installations conduct internal evaluations, while Army MACOMs or Marine Corps higher HQs conduct external evaluations. Federal, state, or local inspections may result in civil and criminal penalties for noncompliance with environmental laws and regulations. Self-assessment can be conducted using the installation status report software (Part II – Environmental). When afloat or under Naval authority, commanders should become familiar with Naval Warfare Publication (NWP) 4-11 for further guidance to incorporate environmental considerations into naval force operations.

## **FEDERAL AND STATE REGULATORY INSPECTIONS**

6-2. Regulatory agencies, such as the Environmental Protection Agency (EPA), have the legal right and responsibility to inspect units and facilities to

ensure compliance with environmental laws and regulations. These agencies usually coordinate inspections through the installation's environmental office. The agencies may, however, conduct inspections without notice.

6-3. The EPA and Federal Facilities Compliance Act (FFCA) set inspection frequency guidelines. For example, inspections for HW facilities under the RCRA generally occur annually.

6-4. Inspections in other programs may occur at different frequencies. Installations and units with specific major problems can expect frequent follow-up inspections that may include checks of training records and documentation, permit reviews, and storage facilities.

#### **ENVIRONMENTAL COMPLIANCE ASSESSMENT SYSTEM/ENVIRONMENTAL COMPLIANCE EVALUATION**

6-5. In the US, regulatory agencies (i.e., state agencies, the EPA, or the US Fish and Wildlife Service [USFWS]) conclusively determine installation compliance with environmental laws and regulations. However, many environmental regulations require self-regulation in which case the installation monitors its own programs and notifies the regulatory agency when problems occur.

6-6. Military services conduct internal compliance assessments for their installations. Units participate in these assessments, which review all aspects of the installation's environmental status to include the following:

- Training.
- Planning and programming.
- Resourcing.
- Correcting past deficiencies.
- Preventing pollution.
- Managing natural and cultural resources.
- Complying with emissions standards.
- Maintaining records and reports.

6-7. The Army established the ECAS, and the Marines established the ECE, as a means of achieving, maintaining, and monitoring compliance with applicable environmental laws. In addition, the Army and Marine Corps use compliance assessments as a vehicle to attain environmental program goals.

6-8. Service regulations require units with HW and HM to conduct internal inspections. HW coordinators for larger units can request a copy of the ECAS/ECE protocol to assist in developing inspections and record-keeping plans. The installation's HW management plan should contain sufficient

information to develop an inspection plan for a unit's HW generation points and accumulation sites. Units should contact the environmental office for ECAS/ECE protocol or for ECAS/ECE checklists to conduct an internal self-assessment.

6-9. OCONUS MACOM commanders determine the scope of compliance assessment within their commands based on the SOFA and FGS requirements for the country in which they are located. In the absence of an FGS, OCONUS MACOM commanders use the OEBGD. These requirements govern the activities of the supporting installation, and installation requirements direct unit assessment activities.

6-10. Unit leaders set the tone for environmental compliance within their units. They bring focus, direction, and commitment to environmental protection. Their role requires them to demonstrate commitment, organize for success, train their units, resource the effort, and build the unit's environmental ethic. The success of the unit-level environmental program depends on: receiving adequate guidance and support from the chain of command and installation environmental office, increasing communication at all levels, and establishing an effective management structure. Environmental protection must be incorporated into command policy and guidance and enhanced through the chain of command.

6-11. Leadership direction and support are needed to implement improvements in all facets of environmental stewardship. To that end, unit leaders must ensure that units have active and strong environmental programs that support the installation's environmental program. This chapter addressed typical programs that the unit leader ensures are in place or supported.

## **ESTABLISHING A UNIT-LEVEL PROGRAM**

6-12. To establish an effective unit environmental program, the unit leader should:

- Ensure all unit personnel have had environmental awareness training. Environmental training sources are identified in Chapter 3. Sources of assistance at the installation/garrison/ base are provided in Chapter 5. Appendix D provides sources of environmental assistance for all operations. Units should use sources that are closest to them before they seek additional/ outside assistance.
- Designate an ECO or a HM/HW Marine who is properly trained and qualified. This individual will interface with appropriate environmental personnel and ensure that the unit is in compliance with environmental laws and regulations.
- Meet with key higher unit staff counterparts (battalion S3/S4 for a company-sized organization) and installation personnel who deal with environmental issues. Find out what their requirements are concerning environmental training, qualifications, and certification of

unit personnel, ECAS inspections that may effect the unit, and common environmental problem areas and how to avoid them.

- Ensure the unit has a well-written SOP that addresses environmental issues and procedures that apply to the unit (coordinate environmental requirements with appropriate installation/chain of command personnel). An example is provided at Appendix C.

6-13. The following are unit or installation environmental programs that units develop or adopt:

- HM management.
- HW management.
- HAZCOM.
- Pollution prevention and hazardous waste minimization (HAZMIN).
- Recycling program.
- Spill prevention/response plan.

#### **HAZARDOUS MATERIALS**

6-14. The Army's objective is to minimize health hazards and environmental damage caused by the use and misuse of HM. A hazardous material is one that, because of its quantity, concentration, physical, chemical, or infectious characteristics, may do the following:

- Cause, or significantly contribute to, an increase in mortality or an increase in serious, irreversible, or incapacitating reversible illness.
- Pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

6-15. If a unit deals with HM, leaders should do the following:

- Ensure the best management practices for all HM.
- Comply with all applicable regulations, policies, and procedures.
- Order and use only what is required; do not stockpile HM.
- Use nonhazardous substitutes to the maximum extent practicable.
- Conserve resources through recovery, recycling, and reuse.
- Establish procedures to identify and correct management deficiencies.

- Establish a training program and ensure that required personnel are properly trained.
- Ensure adequate spill prevention and control equipment are on hand.
- Coordinate training requirements with the chain of command and the installation EMO/safety officer.
- Comply with the chain of command and installation HM requirements.
- Ensure compliance with special disposal/turn-in procedure for batteries.
- Establish HM spill procedures.
- Establish HM fire/explosion procedures.
- Establish emergency first aid procedures.
- Ensure that adequate protective equipment is available.
- Refer to applicable HM references.
  - AR 200-1.
  - AR 700-141.
  - Title 40, CFR, part 761.
  - TM 38-410.

## **HAZARDOUS WASTE**

6-16. The presence of HW is a cause for concern among installation personnel and nearby residential populations. Yet, hazardous substances are an unavoidable part of Army and Marine Corps activities and ultimately result in some waste generation. The proper handling and disposal of these wastes will minimize danger and ensure the safety of people and the environment. If a unit deals with HW, leaders should do the following:

- Establish an HW management program to comply with HW regulations.
- Ensure HW is properly identified. Label stored waste and the containers that hold HW with the correct danger and warning signs.
- Ensure wastes do not accumulate beyond allowable quantity and time limits.
- Maintain proper HW records, and report periodically, as required by EPA.

- Employ waste minimization techniques as a part of pollution prevention efforts.
- Ensure compliance with on-post HW transportation requirements. Contact the installation DRMO or DOL for details.
- Ensure compliance with off-post HW transportation requirements. Public road use increases transportation requirements. Contact installation DOL/FMO for movement approval.
- Ensure drivers transporting HW are qualified. Transporters of HM must be trained by law, according to DOT HM 181 and 126F.
- Establish an HW training program, and ensure proper personnel training occurs. Most installations conduct HW train-the-trainer programs.
- Maintain a liaison with key chain of command and installation personnel.
- Appoint an ECO/(HW/HM) Marine to the unit.
- Ensure the unit ECO/(HM/HW) Marine has sufficient support to carry out his duties.
- Ensure unit personnel use their PPE when handling HW.
- Ensure adequate spill prevention and control equipment is on hand.
- Establish HW fire/explosion procedures.
- Establish HW spill/leak procedures.
- Establish emergency first aid procedures.
- Ensure that unauthorized storage or disposal of HW does not occur. HW must be stored only in authorized containers and disposed of as directed by the EMO/DRMO.
- Refer to applicable HW references.
  - AR 200-1.
  - AR 420-47.
  - RCRA.
  - Title 29, CFR, part 1910.
  - Title 40, CFR, parts 259, 260-281, 300-302, 761.
  - Title 49, CFR, parts 106-178.

– TM 38-410.

## HAZARDOUS COMMUNICATIONS

6-17. An effective HAZCOM program will assist leaders to determine what hazardous chemicals are present in their units, how to protect their soldiers from hazards those chemicals present, and how to properly store and use those chemicals. The installation safety officer is the POC for most HAZCOM matters, the MSDS program, and the HAZCOM training program.

On 13 April 1994, 1SG Smith became the First Sergeant of Company C, 3/151st Infantry, Fort Yukon. One of his first actions was to conduct a walk through the unit area with the platoon sergeants. While in the 2nd platoon's area, the 1SG found a locked room, which the platoon sergeant unlocked. Inside was a collection of cans, bottles, and other containers filled with various solvents and cleaning products. The 1SG told the platoon sergeant to clean up the room. The platoon sergeant passed on the order to the squad leader responsible for the room. The squad leader and his squad quickly removed the room's contents, placing the various containers in the dumpster behind the dining facility. Shortly thereafter, mess personnel placed lunch meal waste into the same dumpster. Almost immediately, the dumpster began to burn and let off large amounts of strange looking smoke. The Fort Yukon Fire Department was called. Upon arrival, the fire chief noticed the smoke's strange color and odor, and determined that it was a chemical fire. Subsequent inquiry determined that the unit's personnel needed training on identifying, storing, and disposing of hazardous material and hazardous waste. The unit's leaders learned that precise orders needed to be given and that those receiving them should seek clarification for unclear matters.

Would this incident have happened in the first place had this unit had effective unit-level environmental programs?

6-18. In support of HAZCOM, unit leaders should do the following:

- Ensure their subordinates receive adequate training on HM to which they are exposed, in accordance with the OSHA requirement.
- Maintain an up-to-date list of all HM/HW known to be present in their area.
- Ensure containers of hazardous substances are labeled, tagged, or otherwise marked to identify the material and warn soldiers of hazards.
- Maintain a MSDS for every HM in their unit (see Appendix C).
- Ensure soldiers/Marines are trained to recognize, understand, and use the MSDS and labels for the HM to which they are exposed.
- Ensure soldiers/Marines use proper procedures when working with hazardous substances.
- Refer to applicable HAZCOM references.

- AR 40-5.
- AR 385-10.
- AR 700-141.
- Title 29, CFR, part 1910.

#### **POLLUTION PREVENTION AND HAZARDOUS WASTE MINIMIZATION (HAZMIN)**

6-19. This program compliments the HM/HW/HAZCOM programs. HAZMIN means reducing the amount and toxicity of the HW generated or produced. Pollution prevention means reducing the amount of material, whether it is hazardous or not. For example, recycle to reduce the amount of trash that goes into landfills.

6-20. Unit leaders should ensure their units conduct inventory control. A unit should not stockpile HM. If a HM has an expired shelf life, it can cost much more to dispose of the item than it did to obtain it, since the HM will have to be handled as an HW.

6-21. Product substitution is an easy way to reduce HW generation. Unit personnel should review the HM inventory in their areas and check if there are nonhazardous or less hazardous substitutes available. Examples are using solvents or replacing the sand used in sandblasting operations with plastic beads, which last longer and can be recycled.

6-22. A process change can reduce the amount of HW generated. A vapor degreaser could be replaced by a soap-and-hot-water parts cleaner. Changing processes in painting operations can reduce overspray and pollution; however, the waste water still needs to be treated as HW, since paint particles can become waste material.

- Refer to applicable pollution prevention and HAZMIN references.
  - AR 200-1.
  - EPA/625/7-88/003.
  - EO 12856.
  - Title III, Clean Air Act Amendments of 1990 (PL101-549).
  - Title 40, CFR, part 262.41.
  - United States Army Environmental Hygiene Agency (USAEHA), Trainer's Guide (TG) No. 178.
  - Environmental Product Guide.



**RECYCLING PROGRAM**

6-23. The Army and Marine Corps are promoting separating products, substituting materials, and changing procedures to avoid the use of hazardous substances (source reduction), and recycling to reduce the volume of solid waste. Most installations have a recycling program. To support that program, personnel should do the following:

- Recycle all recyclable materials. Recyclable materials include computer printouts, corrugated cardboard, computer punch cards, newspaper, high grade white paper, aluminum cans, plastics, oil, solvents, glass, steel, and brass. Check with the installation environmental office to verify the material being recycled locally.
- Separate the recycling material source is separated. Contaminated material must be removed from recyclables.
- Refer to applicable recycling references.
  - AR 200-1.
  - EO 13101.

**SPILL PREVENTION AND RESPONSE PLAN**

6-24. It is Army and Marine Corps policy and a Clean Water Act requirement to prevent oil and hazardous substance spills and to provide prompt response to contain and clean up spills. The discharge of oil or hazardous substance from installations, vehicles, aircraft, and watercraft into the environment without a discharge permit is prohibited. Exceptions will be made in cases of extreme emergency, in which where the discharge is:

- Considered essential to protect human life.
- Authorized by a discharge permit or installation on-scene coordinator (IOSC) during a spill incident response.

6-25. Every reasonable precaution should be taken to prevent spills of oil and hazardous substances. The unit leader should:

- Provide facilities to store, handle, or use oils and hazardous substances and implement proper safety and security measures.
- Appoint a spill coordinator and members of the unit spill response team; this designation should be in writing.
- Maintain an up-to-date spill response plan. This requirement is generated by the installation.
- Conduct periodic spill response drills.

- Ensure sufficient equipment and supplies (absorbent materials) for spill responses are on hand and pre-positioned in the unit. See Appendix C for a sample list.
- Locate all drains, drainage ditches, streams, ponds, and other water sources/outlets in the area, and plan how to prevent a spill from reaching them.
- Coordinate with the installation safety office, preventive medicine office, and EMO to determine the proper PPE. Know when to attempt to clean up a spill and when to leave the area and contact the installation spill response team for cleanup. This determination will be made by the installation EMO and/or spill response team.
- Maintain a copy of the Installation Spill Contingency Plan (ISCP). Critical/necessary information is contained in this plan, available from the environmental management office.
- Maintain a current list of names and phone numbers of those who may need to be contacted in case of an emergency (i.e., fire department, safety office, provost marshal, and preventive medicine, EMO).
- Maintain an up-to-date inventory of all HM/HW; provide a copy to the post fire department for use in case of a chemical fire.
- Ensure pollutants are not discharged into storm or washrack drains or poured on the ground.
- Ensure small spills are properly attended to, cleaned up, and collected. Contaminated soil needs to be disposed of properly. Contact the installation EMO for additional information.
- Strictly control the discharge of ballast water from watercraft.
- Ensure the treatment of waste oil complies with all applicable federal, state, and local requirements.
- Ensure wastes produced during the cleaning of fuel storage tanks and combustion engine components are collected and treated as required before discharge.
- Monitor wastewater discharges containing oil or hazardous substances to comply with permit limits.
- Report oil, fuel, or other hazardous pollutant spills are reported to the EMO and higher headquarters. The S4/G4 and the post EMO can provide information on reportable spill quantities.
- Establish HM/HW fire/explosion procedures.
- Establish emergency first aid procedures.

- Refer to applicable spill prevention references.
  - AR 200-1 (general).
  - Title 40, CFR, part 110 (oil), 302 (hazardous substances), 355 (extremely hazardous substance).

## **PROGRAM ASSESSMENT**

6-26. Environmental compliance status can be determined through a formal inspection by a regulatory agency. It can also be determined through self inspections using ECAS checklists as a guide. Non-Army or Marine Corps regulatory agencies have the legal right and responsibility to inspect units and individual facilities and actions to ensure compliance. Often the first indication that federal, state, or other inspectors are on post is when they visit the installation environmental coordinator's office, or the provost marshal's office, asking for directions to a specific site on the installation.

6-27. Once a year, EPA inspectors conduct spot inspections of installations, often without notice. Local and state inspectors also conduct frequent inspections. Regulatory inspections often concentrate on a particular area, such as HW management. Inspection frequency guidelines have been established under the EPA Federal Facility Compliance Strategy. For example, inspections for HW facilities under the RCRA generally occur annually. Inspections in other programs may occur at different frequencies. Installations and units with specific major problems can expect more frequent follow-up inspections.

6-28. The Army established the ECAS as a means of achieving and monitoring compliance with applicable federal, state, regional, and local environmental laws and regulations. In addition, the Army uses compliance assessment as a vehicle for attaining Army environmental program goals and improving program visibility. If a unit deals with HW and HM, leaders are required to conduct internal inspections. HW coordinators for larger units can request a copy of the ECAS protocol to assist in developing inspections and recordkeeping plans. However, the installation HW management plan should normally contain information sufficient to develop an inspection plan for HW generation points and accumulation sites at the unit level. Contact the environmental office for an ECAS protocol to conduct an internal/self-compliance assessment.

6-29. OCONUS commanders determine the scope for the ECAS within their commands. They often implement procedures to ensure compliance with applicable host nation, SOFA, and FGS requirements, as well as the requirements of AR 200-1 and AR 200-2.

6-30. G3/S3 and G4/S4 personnel can help to ensure compliance. Appendix H has a generic aid that can be used to assess unit environmental compliance status. The battalion staff or installation environmental office may have similar aids specific to a unit or location. Key installation and personnel for compliance assistance are discussed in Chapter 5.

## **UNIT SELF-ASSESSMENT**

6-31. Unit leaders use the general checklist in Appendix H to assess unit environmental compliance status. Higher level staffs within the chain of command or the installation's environmental office may have similar aids specific to a unit or location. Units also use ECAS/ECE checklists as a supplement to the self-assessment guide in Appendix H. Unit leaders, with the assistance of the installation's environmental staff, determine the frequency of self-assessment checks. The commander ensures that the unit's environmental program management system is effective through self-assessment.

## **UNIT MANAGEMENT PRACTICES**

6-32. Many environmental requirements at the unit level are simply an extension of existing unit management practices. The most basic is ordering only enough supplies to do the job. The presence of HM makes this practice even more important. HM disposal is expensive and carries with it a significant administrative burden.

## **Hazardous Substance Management System (HSMS)**

6-33. The Army's HSMS is applies centralized management and strict inventory control to reduce the use and disposal requirements for hazardous substances by tracking HM.

## **Good Housekeeping**

6-34. Good housekeeping is another basic management practice. It involves a number of activities in areas such as maintenance, operations, and training. For instance, preventing spills is a good housekeeping practice for both safety and environmental reasons. Keeping noise to a minimum is good OPSEC, and it also reduces noise pollution. Recycling diminishes solid waste and helps eliminate unauthorized disposal of some types of HW.

## **SOP**

6-35. Effective management practices require rules that soldiers and Marines understand and follow. Unit leaders ensure that the unit has a well-written SOP addressing environmental issues and procedures. (See Appendix C for a sample of a unit environmental SOP.)

## **ECO and HW/HM Marine**

6-36. Commanders, down to the company, troop, and battery levels, must designate an ECO. AR 200-1 now requires Army unit commanders to appoint the ECO in writing and provide training for the ECO. The ECO coordinates with the installation's environmental staff and ensures the unit complies with environmental laws and regulations. MCO P1200.7S identifies the specific duties for the Marine version of the ECO, the HW/HM (MOS 9954) Marine. This MOS is assigned as a secondary MOS for a Marine.

6-37. Unit commanders must consider unit missions and environmental requirements when designating the ECO and selecting appropriate training. Once appointed and trained, the ECO becomes the commander's "eyes and ears" on environmental matters.

### **Training**

6-38. Training is another important management practice. Commanders ensure that all unit personnel complete environmental awareness training. The environmental training resources addressed in Chapter 5 and Appendix D provide information/POCs available for training support. Additionally, commanders must identify those soldiers and Marines who require special environmental training (RCRA- or OSHA-mandated training). Installation environmental offices and environmental staffs assist subordinate commanders to determine specific environmental training requirements. Commanders check training records quarterly to ensure that environmental training status is current. See Chapter 3 for a discussion of environmental-specific training opportunities.

### **Container Labeling**

6-39. Container labeling is a basic management practice often overlooked. Installation or shipping environmental guidelines specify labeling requirements. Labeling HM and HW is a legal requirement. Materials not technically classified as hazardous—cleaning supplies, lubricants, and paints must also be labeled. Labeling these materials with dates allows supply personnel to rotate stocks and issue older items first, a procedure called "first-in-first-out" (FIFO) rotation. FIFO rotation reduces the quantity of out-of-date materials requiring disposal.

6-40. Finally, each unit must develop and enforce procedures to maintain complete records of the environmental actions and activities they perform. For example, DOD has requires each of the component services to record and archive pesticide use during military applications. This information is important to document potential risks to human health and the environment from such practices (and to help establish or eliminate causes of unusual incidents). An example of this is the continuing investigation to decipher the causes of many of the ailments associated with Operations Desert Shield/Desert Storm.

### **MAINTENANCE**

6-41. Unit maintenance activities have significant potential for environmental impact. Most Army and Marine Corps environmental programs affect maintenance operations in some way. Some specific areas of concern are as follow:

#### **Spill Prevention and Response**

6-42. Army and Marine Corps policy, as well as federal law, requires units to prevent spills of oil and hazardous substances and to provide prompt response to contain and clean up such spills. These laws, regulations, and

policies prohibit any discharge of oil or hazardous substance from installations, vehicles, aircraft, and watercraft into the environment without a discharge permit.

6-43. Installation requirements shape spill prevention and response plans for units within their jurisdiction/command. During deployments, the deployment order directs spill prevention and response procedures. During contingency operations or combat, spill prevention and response procedures are defined by HN or theater guidance and the unit SOP (see Tabs A and B, Appendix C). Typical unit-level responsibilities include the following:

- Ensuring that the unit SOP complies with the Installation Spill Contingency Plan (ISCP).
- Providing adequate facilities for storing and handling POL products and hazardous substances.
- Implementing safety and security measures in areas where spills are likely (i.e., maintenance areas, fuel points, supply facilities, and accumulation points).
- Appointing a trained spill coordinator and spill response team.
- Conducting periodic spill response drills.
- Maintaining adequate equipment and supplies for spill response.
- Posting telephone numbers of the installation's spill response agencies.

### **HM/HW Storage and Handling**

6-44. Motor pool personnel work with a variety of HM/HW. The unit's prescribed load list (PLL) section controls requisitions and receipts for HM and prepares documentation for turn-in of HW. Mechanics generate HW by lubricating, servicing, and repairing equipment. Motor pool personnel must:

- Requisition only the minimum amount of HM needed. When possible, substitute nonhazardous materials.
- Practice inventory control of all HM/HW (to include monitoring HM shelf life and HW accumulation dates).
- Store HM/HW in approved containers and locations.
- Maintain an MSDS for each HM used.
- Obtain any necessary/applicable permits.

**Refueling**

6-45. Refueling operations create significant potential for POL spills and fire hazards. Units must ensure their SOP includes adequate procedures to prevent and respond to spills. Fuel handlers require spill response training. Unit leaders provide all fuel points and refueling vehicles with spill response kits. Since small spills occur often, fuel handlers must remove contaminated soil, absorbents, and rags from the refueling site and dispose of them according to installation guidelines.

**SUPPLY**

6-46. Unit supply personnel account for all materials during HM/HW requisition, transportation, storage, and disposal. Unit leaders ensure their supply personnel observe stringent HM supply economy measures. Units order only the very minimum amount of HM needed. When possible, supply personnel order biodegradable, environmentally safe materials.

6-47. When storing products, supply personnel ensure first-in-first-out (FIFO) stock rotation to minimize the turn-in of out-of-date material. They also follow installation storage guidelines for marking materials, maintaining MSDSs, and turning in excess materials to the installation's "pharmacy" points. Finally, unit leaders ensure that supply personnel turn-in or dispose of HM/HW according to local regulations. Compliance includes coordinating with the local environmental office and DRMO.

**NUCLEAR, BIOLOGICAL, CHEMICAL**

6-48. HM are used in NBC defense and training. Unit NBC specialists exercise caution when storing these materials. As with other HM/HW, unit NBC personnel dispose of materials according to local regulations. Unit leaders ensure that the unit's spill response program addresses NBC activities. Unit NBC specialists also monitor turn-in procedures for:

- Batteries for NBC-related equipment.
- Expired NBC supplies.
- Decontaminants.
- Sampling kits.
- Used NBC filters.
- Decontamination solutions.
- Fog oil and its additives.

**UNIT MISSION TRAINING**

6-49. Unit mission training is a difficult environmental challenge. Unit leaders must exercise caution with noise pollution, air pollution, waste

disposal, spill protection, water pollution, and cultural and natural resource protection. Units check with the installation's training staff concerning training area restrictions. During training deployments, unit leaders and ECOs coordinate, in advance, for environmental guidance due to differing local, state, or HN regulations. Upon completion of the unit training, units conduct police of training areas in compliance with installation SOPs.

## **COMMUNICATIONS**

6-50. Modern communication systems use many types of batteries. Used batteries are considered a HW in most states and therefore, unit personnel ensure that SOPs specify storage and disposal procedures for each type of battery in the unit.

## **OPERATIONS**

6-51. Operations at any level of the spectrum of conflict do not automatically suspend environmental considerations. Higher commanders' guidance is critical to determine the risk that will be applied to any operation. Decisions on risk are a normal part of the MDMP. See Chapters 3, 4, and 5 for more information about environmental considerations during planning, training, and operations.

## **SPECIAL REQUIREMENTS**

6-52. In addition to meeting the previously stated requirements, some military units, such as the National Guard (NG) and Reserve Component (RC) units and units stationed in foreign countries, must follow additional environmental guidelines.

### **NG and RC Component Considerations**

6-53. Since NG and RC units are seldom co-located with their supporting HQs, their requirements may differ. NG units routinely operate under environmental regulations and laws of a particular state. NG units coordinate through their STARC for environmental guidance when deploying to installations in other states.

6-54. RC units' where subordinate units may reside in different states and comply with substantially different environmental laws. The supporting HQ develops policies that account for differences in state and local laws and regulations. Units separated from their supporting installation must ensure that SOPs and contingency plans adequately address local laws and regulations.

6-55. Given the distances between NG and RC units and their supporting HQ, HM/HW turn-in may require alternative methods such as line haul or contractor removal. The cost of HM/HW turn-in may warrant pollution prevention initiatives to reduce, reuse, or recycle HM/HW on-site. Solvent distillation, for example, may provide significant cost savings over conventional disposal.



6-56. Disaster relief missions present units with challenging environmental protection requirements. Units must not add their own HM/HW to the existing environmental problem. ECOs in NG units coordinate with their STARC HQ for HM/HW support. Unit ECOs also coordinate regularly with disaster relief HQ to determine threats from HM/HW exposure—polychlorinated biphenyls (PCBs) from transformers, POL, or decaying bodies. Unit leaders ensure their soldiers have appropriate PPE when exposed to HM/HW in the disaster area.

### **Units Stationed in Foreign Countries**

6-57. Since military units stationed in foreign countries must consider local environmental policies, the FGS for each country incorporates, and thus takes precedence over, US federal and state regulations. OCONUS installations develop programs based on the FGS. Units continue to follow installation guidelines but may find them very different from US requirements.

### **SUMMARY**

6-58. Unit commanders are responsible for building and implementing a unit environmental program. They use the assistance that is available to them on the installation/garrison/base staffs as well as from unit higher headquarters. Items to assist that program include such tools as the sample SOP in Appendix C and the unit self-assessment in Appendix H, which provides a generic checklist for units to assess compliance with environmental laws and regulations in their daily operations and activities. Unit leaders should supplement the checklist with applicable state, local, or HN environmental requirements. Once supplemented, this checklist serves as the primary tool for unit environmental assessments. However, self-assessment is only a guide and does not provide a final determination of compliance. ECAS or ECE checklists provide a more comprehensive assessment.